

**WALKER LAW GROUP, LLC**

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*Attorney for Defendants RiteChoice Family  
Services, Inc. and Michael Madu*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>ELIE LOUIS-BENJAMIN, JR.</b>	:	
<b>Plaintiff</b>	:	<b>CIVIL ACTION</b>
	:	<b>NO. 2:19-CV-00776</b>
<b>v.</b>	:	
	:	
<b>RITECHOICE FAMILY SERVICES, INC.</b>	:	
<b>and MICHAEL MADU</b>	:	
<b>Defendants</b>	:	

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**DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS AND MOTION  
TO STRIKE PLAINTIFF'S AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT, pursuant to Federal Rules of Civil Procedure 12(b)(6), 12(f) and Local Rule 7.1, Defendants RiteChoice Family Services, Inc. and Michael Madu, by and through their undersigned counsel, respectfully move this Court for an Order: dismissing the Amended Complaint against Michael Madu; dismissing Count IV of the Amended Complaint against RiteChoice Family Services, Inc.; and striking Paragraphs 13, 14, 16, 18D, 18G, 22, 24 and 28 and footnotes 1, 2, 3, 4, 5, and 6 of the Amended Complaint, for the reasons set forth in the accompanying memorandum of law.

Respectfully submitted,

**WALKER LAW GROUP, LLC**

/s/ Michelle S. Walker (MSW1919)

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Dated: May 17, 2019